

WELLS 7.6 of 7.2

CITE: _____

March 17, 1994

Mr. Jeffrey Lawson, President
Environmental Project Control
63 Great Road
Maynard, MA 01754

? EVER ? => yes
Sent ?

Dear Jeff,

The purpose of this letter is to provide UniFirst with EPA's comments relative to the Interim Data Report on the Analyses for Petroleum-Hydrocarbon Characterization of Unconsolidated Deposits, and Bituminous Concrete from the Unifirst Property (Interim Data Report), dated January 28, 1994. This letter also includes comments regarding the two related letters submitted by Unifirst on October 28, 1993 and March 4, 1994, respectively. The October 28, 1993 letter provided a brief summary of proposed activities to complete the source control investigation at the Unifirst property and included in this letter was a preliminary project schedule. The March 4, 1994 letter provided a revised project schedule and revised approach to specific source control investigation activities.

Interim Report

The Interim Report appears technically sound and thorough relative to the work that was accomplished, including the sampling and analytical procedures necessary to complete the petroleum contamination investigation. However, the role and function of this document relative to implementing the ROD-specified Source Control remedy of soil vapor extraction (SVE) at this property is not clear. For example, the stated objectives of the study (to investigate whether the petroleum contamination was leaching from the pavement and determine if the contamination was similar to the petroleum contamination found in the DNAPL in UC8) are not explicitly linked to implementing the remedy. Although not stated, it appears the program was undertaken to define the potential influence of petroleum hydrocarbon derivatives (PAHs, for example) on the effectiveness of an SVE system.

While the results of the petroleum hydrocarbon investigation appear to be useful to some degree in terms of the overall source control remedy, the PRP has yet to identify a coherent, comprehensive plan to obtain pre-design data to implement the SVE remedy. The specific use of the data collected from these activities must now be coupled with the additional investigations not yet completed, to adequately provide a design basis to conduct a pilot and/or full scale SVE system. It is important to note that this position has been previously communicated to the PRP on several occasions. In addition, the schedule for investigating the petroleum contaminated soils should be modified to allow much more rapid progress.



October 28, 1993 Letter

The October 28, 1993 letter provides a general approach to completing additional source control characterizations on the Unifirst property. However, the PRP should provide a more comprehensive scope, such as anticipated depths of borings and proposed analytical methods. The scope should clearly define where data gaps exist, how these gaps will be characterized, and how the results of the characterization will be tied into an overall conceptual model which will be tested in the field.

The October 28, 1993 letter also provides information that contradicts the PRPs original conceptual model as presented in the Pre-Design Work Plan (PDWP); that is, the overburden soil contamination was due to the diffusion of DNAPL from below the water table. For example, the PRP states on page 5 of the October 28, 1993 letter that nine additional wells will be installed in the southwest and south-central portions of the property, and that one purpose of these wells is to help locate "areas of soil contamination that may act as sources of groundwater contamination." The acknowledged possible presence of soil contamination in the southwest and south-central areas of the site by the PRP, in areas that have not been previously identified as potential sources of contamination, supports EPA's position regarding the adequacy of overall source characterization for this site. It also appears that there are other sources of contamination on this property that may have to be handled differently than the VOC contaminated soils. As a result, the PRP needs to clearly define a comprehensive sampling program consistent with the revised conceptual model which allows the project to move forward in a timely manner to field pilot and/or full scale SVE system implementation.

For the record, EPA must rectify the impression given by the first sentence in the October 28, 1993 letter. Throughout all our discussions, it has been the PRP's position that soil-vapor extraction may be impracticable at the UniFirst property. That is not the Agency's position. The Agency continues to believe that additional pre-design work is warranted.

Proposed Schedule (March 4 letter)

The schedule presents a fragmented approach to completing the source area investigations. In July 1993, the EPA requested that the PRP complete air permeability tests and a pilot study along with the additional source area characterizations as soon as possible. According to the PRPs proposed schedule, another full construction season (1994), in addition to the 1993 season already missed, will now be missed and a decision by the PRP on the applicability of SVE as a remedy will still not have been made. Based on our experience, this schedule can be greatly accelerated so that an SVE pilot test can be completed in 1994. There is no

reason why the air permeability tests and an SVE pilot study cannot be performed concurrent with other field activities. It is not necessary to have the site completely characterized for chemical constituents before conducting air permeability tests and collecting additional samples for analysis of physical parameters. It seems apparent that the focus for the source control remedy would be the area of UC8 where DNAPL has been identified; therefore, this area should be the focus of air permeability tests and SVE pilot study.

I refer you back to Paula Fitzsimmon's letter of July 12, 1993 for a discussion of what the Agency believes should be the focus of this pre-design work. The current investigation, while it has served to acquire additional data, must be more clearly focused and streamlined as it proceeds throughout the 1994 field season. If you would like to discuss these issues further, please contact me at (617) 573-9613.

Sincerely,

Mary E. Garren, Remedial Project Manager
MA II Superfund Section

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